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Via Electronic Submission

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Communication*
Section 68.4(a) of the Commission's Rules Governing Hearing
Aid-Compatible Telephones -- WT Docket No. 01-309

Dear Ms. Dortch:

This letter serves as notification that on January 30, 2003, Sprint Corporation, through its representatives, Scott Freiermuth and Kevin Butler, met with Joel Taubenblatt, Mindy Littell, Pat Forster, Joseph Levin and Greg Guice of the Wireless Telecommunications Bureau, Jerry Stanshine of the Office of Engineering and Technology and Gene Fullano of the Consumer and Governmental Affairs Bureau.

The purpose of the meeting was to discuss Sprint Corporation's positions in the above referenced docket. A copy of the presentation material distributed at the meeting is attached hereto.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please associate this letter with the file in the above referenced matter.

Respectfully submitted,



Luisa L. Lancetti

cc: Joel Taubenblatt
Mindy Littell
Pat Forster
Joseph Levin
Greg Guice
Jerry Stanshine
Gene Fullan

Hearing Aid Compatibility

Sprint Corporation
January 30, 2003

CDMA and Hearing Aids

- CDMA employs variable, nonperiodic form of switching or “gating” which results in less hearing aid interference than TDMA/GSM.
 - Present implementation of 3G CDMA has no gating.
- Australian study- CDMA has negligible interference on hearing aid wearers.

HAC is T-Coil NOT Interference

- Hearing Aid Compatibility is a legal term of art that addresses only T-coil coupling.
 - Removal of the exemption will not address the primary problem experienced by hearing aid wearers—interference.
- Commission should focus efforts on interference which would benefit a much wider hearing aid constituency.

Response to SHHH

Shortcomings of SHHH's "technical analysis."

1. SHHH states that "most respondents" have a T-coil in hearing aid, but research indicates that only a small percentage of hearing aids have T-coils and even a smaller percentage of those with T-coil equipped hearing aids use the T-coil feature.
2. Lifting wireless exemption on HAC has no impact on interference generated by the phone, but may negatively impact audio performance.
3. The stronger the inductive field the greater the negative impact on audio performance
4. Directional Antennas may theoretically reduce hearing aid interference but these antennas would likely affect the performance of wireless communications
5. "Extraneous Radiation" of Battery resulting in audible interference is not plausible. Wireless handset batteries are direct current (DC); therefore, shielded cable, twisted pair, and transmission lines are unnecessary.
6. Backlight may result in interference but Sprint phones allow user to turn off backlight as a battery saving feature.
7. Using ferrous metals may enhance shielding but handset may be affected by oxidization causing contaminants.
8. Reduce interference by changing physical design and shape- changes suggested would significantly reduce industrial design options.
9. T-coil "as big as flip part"- would result in significant battery drain or reduce talk time.
10. Filter capacitors added to the audio components would reduce audio gain (i.e., make audio quieter).

Recommended Commission Action

1. Appoint a Technical Council

- Council consisting of consumers, wireless industry, hearing aid manufacturers, and audiologists.
- Council headed by impartial chair.
- Council to prepare report within 12-18 mos. addressing:
 - Whether or not to lift wireless HAC exemption
 - If so, Council shall recommend:
 - » A wireless HAC standard (i.e., non-Part 68).
 - » How to phase-in compatibility
 - » Whether all phones or some phones need to be T-coil compatible.
 - Technical analysis of Interference issues including potential mitigation techniques which may be achievable in hearing aids and/or wireless phones.

Recommended Commission Action

2. Commission should encourage Technical Council to revisit ANSI C63.19.

- The standard is fraught with many problems but it may be salvageable.
- Modification of standard will require participation between handset and hearing aid manufacturers.
- Continue to press FDA to elicit hearing aid manufacturer participation.

Recommended Commission Action

3. Commission should develop a consumer education program.
 - TTY Consumer Alert as an example- government is in best position to create a highly-credible and useful message.

What Can Carriers Do?

- Assist the Technical Council by:
 - Providing information upon request.
 - Donating handsets for testing.
 - Providing facilities for testing.
- Assist the Commission in educating customers by not only providing the Commission's "HAC Consumer Alert," but by also supplementing this message with carrier-specific information.
 - For example, notify customers about hearing aid accessories that allow T-coil coupling; informing customers about interference mitigating techniques like turning the backlight off, etc.
- Educate and equip customer care and sales forces to respond effectively to inquiries from hearing aid wearers.